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Jay C. Keithley
Vice President
Law and External Affairs
United Telephone Companies

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November 1, 1993

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

Mr. William F. Caton, Acting Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Washington, D.C. 20036

RE:

In the Matter of Reform of the Interstate Access Charge Rules

Docket No. RM 835

Dear Mr. Caton:

Attached is the original and four copies of the Comments of United and Central Telephone Companies in the matter referenced above.

Sincerely,

Jay C. Keithley

Vice President

Law and External Affairs

Luy C. Kerthley

Attachment

JCK/mlm

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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION

OFFICE OF THE SECRETARY

In the Matter of:)	/	/
Reform of the Interstate Access Charge Rules) }	Docket No. RM 8356	

COMMENTS OF UNITED AND CENTRAL TELEPHONE COMPANIES

The United and Central Telephone companies, ("United"), pursuant to Public Notice¹ hereby provide their Comments on the United States Telephone Association's ("USTA") Petition for Rulemaking.

United supports access reform and believes that an integrated approach that considers appropriate changes to separations procedures, rate of return monitoring, pricing flexibility, and competition in the marketplace should be used so that all necessary issues are covered in one unified proceeding. Piecemeal changes and proceedings applicable to only portions of the access charge regulatory structure will not appropriately identify impacts on other access charge related rules and systems and should be rejected in favor of a unified docket that considers all areas of access charge regulation where change may be needed.

^{1.} Public Notice, RM 8356, Released October 1, 1993.

United believes that this proceeding, dealing with only the USTA proposals, is not an appropriate mechanism to consider such coordinated changes in light of other filings made by NARUC, Ameritech and Rochester Telephone. Rather than attempting to use this proceeding to unify the process of access charge change, United recommends that the Commission initiate a Notice of Inquiry beginning a comprehensive review of potential access charge changes and other related regulatory issues.

Respectfully submitted

UNITED TELEPHONE COMPANIES
CENTRAL TELEPHONE COMPANIES

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P. O. Box 11315
Kansas City, MO 64112
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Their Attorneys

November 1, 1993

CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 1st day of November, 1993, sent via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Comments of United and Central Telephone Companies" in the Matter of Reform of the Interstate Access Charge Rules, Docket No. RM 8356 filed this date with the Acting Secretary, Federal Communications Commission, to the persons listed on the attached service list.

Melinda L. Mills

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* Indicates Hand Delivery